

**CALIFORNIA COASTAL COMMISSION**

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Staff Report: 8/20/03  
Hearing Date: September 11, 2003  
Commission Action:

**STAFF REPORT: REGULAR CALENDAR**

**APPLICATION NUMBER:** 5-03-280

**APPLICANTS:** The Urban Wildlife Group, Attn: Travis Longcore; Los Angeles Conservation Corps, Attn: Dan Knapp; Los Angeles County Department of Beaches and Harbors, Attn: Joseph Chesler

**PROJECT LOCATION:** Esplanade between Miramar Park and Avenue I, Redondo Beach (Los Angeles County)

**PROJECT DESCRIPTION:** Pilot restoration project on a 2-acre, approximately 35-45 foot high beach fronting bluff. Project consists of removing two acres of iceplant on the bluff face and replacing it with coastal scrub and native dune plants. 2,420 cubic yards of grading is proposed using hand and small power tools to prepare the planting bed and to distribute the existing soil evenly across the project site. Installation of a 3-foot high split rail fence along the top of the bluff and approximately eight 3-foot high by 2-foot wide recycled plastic educational signs explaining the restoration.

**SUMMARY OF STAFF RECOMMENDATION:**

Staff is recommending that the Commission grant a coastal development permit for the proposed development with special conditions relating to erosion control, landscape monitoring and maintenance, and public access.

**SUBSTANTIVE FILE DOCUMENTS:**

1. City of Redondo Beach Land Use Plan
2. The Coastal Commission April 8, 2003 staff report approving the City of Redondo Beach Implementation Plan for Coastal Zone Area One.
3. Redondo Beach Bluff Restoration Pilot Project Coastal Development Permit application and Landscape Plan, The Urban Wildlands Group, Los Angeles Conservation Corps and L.A. County Department of Beaches and Harbors, July 2, 2003.

4. Redondo Beach Bluff Restoration Pilot Project Preliminary Monitoring Plan, The Urban Wildlands Group, Los Angeles Conservation Corps and L.A. County Department of Beaches and Harbors, July 18, 2003.
5. Coastal Development Permits: A-5-PDR-01-442, 5-00-199.

**STAFF RECOMMENDATION:**

The staff recommends that the Commission adopt the following resolution to **APPROVE** the coastal development permit application with special conditions:

**MOTION:**     *I move that the Commission approve Coastal Development Permit No. 5-03-280 pursuant to the staff recommendation.*

**STAFF RECOMMENDATION OF APPROVAL:**

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

**RESOLUTION TO APPROVE THE PERMIT:**

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

**II.     STANDARD CONDITIONS:**

1.     Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2.     Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be

pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### III. **SPECIAL CONDITIONS:**

#### 1. **Final Plans**

##### A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit, for review and approval of the Executive Director:

1. Final plans for landscaping that substantially conform with the permit application and plans submitted to the Commission, titled Redondo Beach Bluff Restoration Pilot Project dated July 2, 2003.
2. Final plans for monitoring that substantially conform with the preliminary monitoring plan submitted to the Commission, titled Preliminary Monitoring Plan for Redondo Beach Pilot Project, dated August 18, 2003.

##### B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

#### 2. **Erosion and Runoff Control Plans**

##### A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit, for review and approval of the Executive Director, a plan for runoff and erosion control.

##### 1. **EROSION CONTROL PLAN**

- (a) The erosion control plan shall demonstrate that:

- (1) During construction, erosion on the site shall be controlled to avoid adverse impacts on the beach and the public bike path.
- (2) The following temporary erosion control measures shall be used during installation of the plants: biodegradable fiber rolls, geo-fabric blankets and wind barriers, jute (not plastic) sandbags.
- (3) The applicant shall employ no hay or straw bales or other weed sources.
- (4) Following installation of the plants, the site shall be stabilized immediately with jute matting or other BMPs to minimize erosion during the rainy season (November 1 to March 31).
- (5) During establishment of the plants, the applicant shall inspect the area each fall in order to determine if there is erosion. If there is erosion, the applicant shall replace sandbags and matting and other temporary erosion control measures as necessary.
- (6) No permanent irrigation system shall be allowed. Temporary above ground irrigation to allow the establishment of the plantings is allowed. If a temporary above ground irrigation system is used, then, once all plantings have been established, the temporary irrigation system shall be removed.

(b) The plan shall include, at a minimum, the following components:

- (1) A narrative report describing all temporary erosion control measures to be used during construction.
- (2) A site plan showing the location of all temporary erosion control measures.
- (3) A schedule for installation and removal of the temporary erosion control measures.

## 2. RUN-OFF CONTROL PLAN

(a) The run-off control plan shall demonstrate that:

- (1) Run-off from the project shall not increase sedimentation to the beach and offshore waters.
- (2) Fencing or barrier plants shall be employed to prevent pioneered trails and to keep visitors on established ramps.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

**3. Landscaping installation and Monitoring**

A. Installation and ongoing monitoring. The applicant shall undertake plant installation and ongoing monitoring and maintenance as outlined in its proposals: "Redondo Beach Bluff Restoration Pilot Project Coastal Development Permit application and Landscape Plan" by The Urban Wildlands Group, Los Angeles Conservation Corps and L.A. County Department of Beaches and Harbors, July 2, 2003, and its "Redondo Beach Bluff Restoration Pilot Project Preliminary Monitoring Plan", of August 18, 2003, consistent with the methods and goals outlined therein, for the five year term described in those documents.

B. Five years from the date of issuance of Coastal Development Permit No. 5-03-280, the applicant shall submit for the review and approval of the Executive Director, a monitoring report, prepared by a licensed biologist, landscape architect or qualified resource specialist that assesses whether the on-site restoration is in conformance with the restoration plan dated July 2, 2003 and provides no less than 70 percent coastal bluff scrub (CBS) and dune plant cover with 20 percent bare sand and no more than 10 percent exotic plant cover. The monitoring report shall include photographic documentation of plant species, plant coverage and an evaluation of the conformance of the resultant landscaping with the requirements of this special condition.

C. If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and approval of the Executive Director. The revised landscaping plan must be prepared by a licensed landscape architect or a qualified resource specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

D. The permittee shall undertake development in accordance with the approved final plan and schedule and other requirements. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

**4. Fence Plans**

**PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant will submit, for the review and written approval of the Executive Director, a fence plan showing the design and location of the bluff top fence. The fence shall not block views and shall be of an open design and designed to blend with the site to the fullest extent practical. The applicant shall maintain the fence as indicated on approved fence plans.

**5. Manual for Maintenance**

A. In addition to the elements noted above, the applicant shall prepare, as part of its detailed plans, a manual for maintenance methods and a plan prepared by a qualified restoration specialist or biologist for training maintenance employees (and contractors) in the needs of the plants on the plant palette and on the identification of native and invasive plants. Accordingly, the plan shall include:

- (1) A list of chemicals the applicant proposes to employ and methods for their application. Said chemicals shall not be toxic to fish or wildlife or persistent in the environment. Herbicides, if used shall be applied by hand application or by other methods that will prevent leakage or percolation. Herbicides that are not persistent and that are non-toxic to animals (including invertebrates and insects) may be used if approved in advance by the Executive Director as meeting these criteria.
- (2) Watering and pruning needs.
- (3) Identification of both invasive and native plants.
- (4) Methods of weed control, including the weeds and invasive plants targeted for removal.

B. Compliance. The permittee and any contractors shall undertake development and maintenance of the site (including monitoring, maintenance, and training) in accordance with the final approved plan and with this condition. Any proposed changes to the approved final plans or maintenance methods shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

**6. No Beach Access or parking closure**

The public beach, public parking or the coastal access ways within or adjacent to the project site shall not be closed during construction as a result of project activities or storage of materials from the project.

**7. Construction Responsibilities and Debris Removal**

The permittee shall comply with the following construction-related requirements:

- (a) No heavy equipment shall be allowed at any time on the beach or public bike path for construction of the project.
- (b) There shall be no stockpiling of graded or plant material on the beach or public bike path.

**8. Coastal Development Permit Required For Removal Of Vegetation Installed as a Result of This Coastal Development Permit**

After establishment of the plants, a coastal development permit from the City of Redondo Beach or a Coastal Commission amendment to this permit 5-03-280 will be required for removal of the coastal bluff scrub and dune plants installed as part of this project. This does not apply to the removal and replacement of dead or diseased plants identified in the monitoring program.

**IV. FINDINGS AND DECLARATIONS:**

The Commission hereby finds and declares:

**A. Project Description and History**

The project site is a two-acre bluff face area that is covered with close to 100 percent of an invasive exotic plant, iceplant *Carpobrotus edulis*. The applicant proposes to restore the face of the bluff with native dune and coastal scrub plants. The site is a bluff face lot located between the first public road and the sea. The site is approximately 1200 – 1250 feet in length and approximately 75 feet in width from the bottom of the bluff to the top. The site is gently sloping from a flat bluff at the upper (inland edge), to the beach bike path at the bottom of the bluff. Soils are consolidated at the top of the bluff. More unconsolidated sand is found at the bottom of the bluff. The site is owned by the L.A. County Department of Beaches and Harbors and is located between Miramar Park and Avenue I, seaward and adjacent to the Esplanade at the top of the bluff and landward and adjacent to the public bike path at the bottom of the bluff within the City of Redondo Beach, Los Angeles County (Exhibit 1). The two-acre site is located on the inland side of the public bike path. The bike path is used by both residents and visitors for recreation activities (walking, jogging, biking, etc.) and access to the shoreline. It extends from Herondo Street (the border between Hermosa Beach and Redondo Beach) to the southern tip of Redondo Beach and continues a short distance into the City of Torrance on the beach. The project is located within a designated public park located approximately one-half mile south of the Redondo Beach Pier. There is an approximately 300-foot wide sandy beach between the site and the mean high tide line. Vertical public access to this beach is available to pedestrians via public access ramps at each end of the project and one lateral ramp in the middle of the project area that extends laterally across and down the bluff (Exhibit 2).

The applicants are proposing to remove approximately two acres of iceplant (*Carpobrotus edulis*) that currently exists on the bluff face at the southern end of Redondo Beach. The applicants are then proposing to install a diverse community of native dune and coastal bluff plants. As described below in the Habitat section, the plants will represent a continuum between a southern foredune community at the base of the bluff (Sand-verbena beach bursage series), to a southern bluff scrub on the upper portion of the bluff. Approximately 2,420 cubic yards of grading using hand tools is proposed to prepare the planting bed and distribute the existing soil material evenly across the project area.

Stockpiling of the graded material and plant materials to be installed will occur on the site itself. A temporary irrigation system will be installed for the purpose of establishing the new plants. Seeds from container plants that have been propagated from local seed and/or cuttings will be used. The applicants propose to protect the site with a three-foot high split rail fence at the bluff top along the County of LA property line, and educational signage around the site indicating the sensitive nature of the revegetation and describing the natural communities that are being reestablished.<sup>1</sup> As part of the project, the applicants propose a landscape-monitoring plan to measure the effectiveness and success of the restoration project. The applicant does not propose any changes to the existing drainage patterns on the site.

Other existing development on the site is a public restroom at beach level at the northern end of the site and a fence that bisects the site approximately halfway down the bluff. The existing fence was installed to keep people from walking down the bluff instead of using the vertical access ways. No change is proposed to the existing development.

## **B. Habitat**

Section 30240(a) of the Coastal Act states:

*(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*

The project site is a two-acre bluff face area that is covered with close to 100 percent of an invasive exotic plant, iceplant *Carpobrotus edulis*. Prior to urbanization, bluff faces in the South Bay supported coastal bluff scrub that supported numerous species, including the El Segundo blue butterfly (*Euphilotes bernardino allyni*), which is currently endangered. According to the application, the County's consultant Dr. Travis Longcore of the Urban Wildlands Group has assessed the site for current suitability for El Segundo blue butterfly and found no food plants (*Eriogonum parvifolium*) and therefore concludes that there is no probability of occupation by the butterfly. The applicant proposes to remove the iceplant by hand and prepare the site by using hand tools to smooth out the dirt evenly across the site. Temporary irrigation will be installed that consists of: a line of sprinklers (Hunter sprinkler heads) running parallel along the bluff above the existing fence, and a line below the fence. The system will be connected to a battery-operated timer but irrigation will occur on an as needed basis. Existing conditions will be monitored and considered when deciding whether or not to activate the irrigation system.

The applicant proposes to replace the iceplant with a diverse community of native dune and bluff plants that will reduce erosion and provide potential habitat for native animals, including the federally endangered El Segundo blue butterfly (Exhibit 3).

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<sup>1</sup> Application for Coastal Development Permit 5-03-280, Exhibit one of submittal – Project Description, dated July 2, 2003 (Exhibit 3).



According to the application and landscape plan dated July 2, 2003, all container plants will be propagated from local seeds and/or cuttings. Local sources include the Palos Verdes peninsula, the El Segundo dunes, and Malibu if necessary to obtain rare species. Container plants will be grown from seed in greenhouse conditions. Seeds will be hand collected and cleaned and refrigerated until application. A native plant nursery has been established at the S.E.A. Laboratory in Redondo Beach, jointly operated by the L.A. Conservation Corps and The Urban Wildlands Group. The Irrigation plan includes temporary irrigation to saturate the soil prior to planting and to establish the plants once installed. No irrigation will be used during the spring and summer months, except where plant re-establishment is required.

The landscape plan includes a planting scheme consisting of a list of potential plants to be installed identified by both their common and scientific names and the location of where each plant will be installed. According to the plan, all plant species will be established simultaneously. The plan states in part:

*Under normal conditions, dune vegetation changes over time following a disturbance. Some plants are good at colonizing bare soil, and others are established later on. Rather than move through these gradual changes – called “successions” – we will establish all species simultaneously. Therefore the plantings will emulate the density and proportion of shrub and subshrub species that are intended to comprise the mature bluff and dune scrub. The plantings are designed to represent a continuum between a southern foredune community at the base of the bluff in the more unconsolidated dune conditions (Sand-verbena beach bursage series), to a southern bluff scrub on the upper, more consolidated sections of the site.<sup>2</sup>*

The site is divided into two zones: Zone A – base of bluff in very sandy soils and Zone B – on bluff in more developed soils (Exhibits 2 & 3). The proposed density is 1,000 – 1,500 plants per acre. The applicant states that because some shrubs will be established from seed, the final shrub density should exceed 1,000 plants per acre. See Exhibit 3 for the plant list for each zone.

The applicant is proposing to install a 3-foot high split rail fence at the top of the bluff to keep visitors off of the newly restored area so that plantings are not destroyed. The applicant proposes eight 3 by 2 foot signs to be located along the top and bottom of the bluff to educate the public on the restoration and the importance of the native coastal habitats.

The applicant proposes to control weeds by weeding the site throughout the winter and spring following plant installation on a biweekly basis. Weeding will be repeated following the winter rains of the second growing season following installation. One year following plant installation, container plants that did not survive will be replaced following the same protocol as the initial installation.

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<sup>2</sup> Application for Coastal Development Permit 5-03-280, Landscape Plan for Redondo Beach Bluff Restoration Pilot Project, dated July 2, 2003.

Commission staff biologist Dr. John Dixon reviewed the proposed project plans and concurs that the submitted plans are appropriate for the type of restoration being proposed. Dr. Dixon's only concern, however, was that monitoring did not appear to be incorporated into the plan. When staff contacted the applicant on the issue, Dr. Travis Longcore agreed that monitoring is needed and is in fact a part of their project but that it just had not been included in the application submittal. On August 18, 2003, staff received the proposed preliminary monitoring plan from the applicant and Dr. Dixon is in agreement with the proposed plan.

The proposed monitoring plan includes: 1) plant assessments – plant coverage will be quantified annually (during month of March each year) using stratified sampling. The target for native plant covering is 70 percent with 20 percent bare sand and no more than 10 percent exotic plant cover. The revegetation also has a target of 25 percent cover by coast buckwheat (*Eriogonum parvifolium*); 2) Photopoints – Progress of revegetation shall be tracked using fixed photopoints (each March); 3) Bird Counts – As part of education portion of the project, bird counts will be completed (quarterly) at the revegetation site and nearby sites dominated by iceplant; and 4) butterfly survey – surveys of butterfly species will be conducted. The project site is within 1,200 feet of occupied El Segundo blue butterfly habitat. According to the applicant, monitoring will occur for five years, at which point there shall be a self-sustaining project. See Exhibit 4 for the preliminary monitoring plan.

The applicant also states that under Coastal Development Permit #5-00-199 (Torrance Beach Improvements), the County of LA is implementing a revegetation project at Torrance Beach nearby. As a part of the contract between the County and Urban Wildlands Group, UWG is providing County maintenance staff with training in the identification and care of native plants. The applicant contends that this Redondo Beach project will provide a further opportunity for continued education of LA County Beaches and Harbors staff.<sup>3</sup> The Commission is requiring that a maintenance manual also be prepared that will assist in the education of those maintaining the site on native plants and invasive plants.

Monitoring is necessary to assure that any restoration project succeeds. Conditions, including public interference, vary with each site. Monitoring can assure that the type of plants is appropriate to that site; that the density of cover is established, and that erosion control weeding and replacement of failing plants occurs. Moreover, there are relatively few coastal bluffs suitable for restoration projects and accessible for such efforts. Restoration is necessary to support the reestablishment of the rare and endangered species that once flourished on these bluffs. While no habitat is displaced in the process, the project represents an opportunity that may not be repeated. Monitoring will provide the applicant and the Commission with useful information for designing future projects.

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<sup>3</sup> Electronic message received from Lauri Ames, planner for LA County Department of Beaches and Harbors, dated August 18, 2003.

Monitoring is necessary for a second reason. If disturbance of the existing soils is allowed to enable restoration, there is the possibility of erosion resulting from the activity itself. The reason the County installed iceplant was to (1) block pioneered trails and (2) stabilize the bluff face. Sloughing occurred due to rainfall and pioneered trails. The proposed plan provides for fencing, coverage dense enough to prevent rain induced erosion, and a fencing system to discourage pioneering new trails down the bluff. It is important to monitor and maintain the site to assure that these features can function as proposed and if corrections are needed to propose necessary changes.

The Commission is requiring as a special condition that final monitoring plans conform to the preliminary plans submitted to the Commission. If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping and monitoring plans approved pursuant to this permit, the applicant is required to submit a revised or supplemental landscape plan for the review and approval of the Executive Director. The Commission finds that coastal bluff restoration that provides potential habitat for an endangered species is consistent with Section 30240 of the Coastal Act.

**C. Geologic Stability/Erosion Control**

Section 30253 of the Coastal Act states in part:

*New development shall:*

*(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*

*(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The project site is located at the southern end of Redondo Beach and consists of a 2-acre bluff face area that is comprised of loose sand at the base of the bluff and more developed, consolidated soils at the top portion of the bluff. There is no geologic evidence that the bluff is unstable, however, the bluff is sand and loosely cemented sandy material and erosion will occur. The existing ice plant on the site was installed as an erosion control measure for the bluff. While eventually ice plant will itself slough off a bluff as a mat, in the mean time the ice plant reduces surface sloughing and discourages unauthorized trails and protects the bluff surface from run-off and wind erosion. The applicant proposes to remove the ice plant and install locally native plants from the coastal scrub and sand dune communities. The applicant expects that native dune and bluff face plants themselves will provide erosion control. According to the applicant, native grass (*Festuca*) will be planted once the irrigation is started in the fall (along with native forbs and other seedstock). The *Festuca* will stabilize the soil while the other plants become established. The *Festuca* is not invasive, and will diminish in cover as the rest of

the plants establish.<sup>4</sup> The Commission recognizes the benefit of restoring the bluff with native plants and suitable habitat for coastal animals and notes that such establishment of plants will prevent erosion. However, the Commission must also be prepared that if the proposed restoration is not successful for whatever reason, measures must be taken to ensure that the bluff will be protected from erosion and runoff. Therefore the Commission is requiring that the final landscape and monitoring plans conform to the proposed plans (70 percent coverage of native plants) and that if the proposed landscape fails, the applicant must submit a revised plan to install some types of vegetation on the bluff that will stabilize the bluff by protecting it from erosion and that revised plan must be submitted to the Executive Director for review and approval. Only as conditioned is the proposed project consistent with Section 30253 of the Coastal Act.

### ***Erosion and Runoff Control***

Sections 30230 and 30231 of the Coastal Act state:

#### Section 30230

*Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

#### Section 30231

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

As discussed above, the project site is currently covered with an exotic iceplant species that while very invasive, serves an erosion control purpose. The proposed project includes 2,420 cubic yards of grading that will be performed by using hand tools and small power tools to remove the iceplant and prepare the planting bed by distributing the soil material evenly across the site. The graded material will be stockpiled on the bank itself and along the lower edge of the bank adjacent to the bike path. The applicant contends that no stockpiling will occur on the adjacent beach or public bike path. Because the proposed

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<sup>4</sup> Electronic message received from Lauri Ames, planner for LA County Department of Beaches and Harbors, dated August 18, 2003.

development will be occurring during the upcoming fall months and potential rainy season, the Commission is requiring that erosion control be implemented during construction. Erosion control measures may include using fiber rolls or geo-fabric blankets to cover exposed dirt when work is not being done such as during the nighttime. Wind barriers should also be used to prevent loose soils from blowing off of the site.

The Commission is requiring that any runoff at the top of the bluff be directed away from the bluff to reduce potential erosion impacts. The site must also be stabilized with jute matting or other BMPs to minimize erosion during the raining season if plantings have not been fully established. If the proposed restoration fails, the applicant must come back to the Executive Director with an alternative landscape plan in order to establish plants that will provide adequate permanent erosion control. Only as conditioned does the Commission find the project consistent with the marine resource protection policies of the Coastal Act.

#### **D. Public Access**

All projects requiring a coastal development permit must be reviewed for compliance with the public access provisions of Chapter 3 of the Coastal Act. Section 30210 states that maximum access and recreational opportunities shall be provided to protect public rights:

*In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

As described above, the proposed project is located between a public right of way and public parking at the top of the bluff (the Esplanade) and a public bike path that is just landward of the public beach at the bottom of the bluff. There is a coastal access ramp at each end of the site (north and south ends) and a coastal access ramp located at approximately the middle of the project site. There is a public parking lot adjacent to the south end of the site. The applicant proposes that there will be no staging of equipment or materials on the beach. The applicant does not propose any beach or bike path closures at any time and also proposes to leave existing ramps that connect the public parking to the beach below, open and available for public access. Those working on the project will need to park in the public parking at the top of the bluff and in the parking lot and will use the bike path intermittently for access to the lower bluff. However, because development will occur after the summer peak beach use season, impacts to parking will be minimal. The project does not adversely impact coastal access. The Commission reiterates in Special Condition 6 that the existing public access (access ramps, parking, bike path and beach) are not to be closed at any time during construction. A 3-foot high, split rail fence is to be located at the top of the bluff to provide habitat protection but will not prevent the public from using the access ramps that run down to the beach. Only as proposed and conditioned is the project consistent with Section 30210 of the Coastal Act.

## **E. Visual Resources**

Section 30251 of the Coastal Act states:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

The proposed project consists of replacing iceplant with native coastal scrub and dune plants along the bluff face. The project also includes the installation of a 3-foot high split rail fence along the bluff top property line (approximately 1,200 feet long) and approximately eight (8) three-foot high by two-foot wide educational signs along the top and the bottom of the bluff (each sign approximately 400-feet apart – See Exhibit 2). The fence will provide habitat protection but at the same time not block public views from inland areas or the Esplanade, a City public right-of-way. Views from the bike path or beach looking inland will not be blocked. The signs will provide the public with educational information about the natural communities that are being re-established on the site. The Commission is requiring the applicant to provide a design plan for the fence to the Executive Director. The design of the fence shall be open and not adversely impact public views. The Commission finds that public views are protected and the project is consistent with the visual resource policies of the Coastal Act.

## **F. Local Coastal Program**

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Development Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program, which conforms with Chapter 3 policies of the Coastal Act:

- (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

The City does not have a certified Implementation Program for the entire coastal zone. On April 8, 2003 the Commission approved the City's Implementation Plan for Coastal Zone Area One (area outside of the Harbor-Pier Area) with suggested modifications. On August 5, 2003 the Redondo Beach City Council formally adopted the Coastal Zone Implementation Plan as modified by the Commission. The Executive Director's review for effective certification is scheduled at the same hearing as this project and if approved by the Commission, the City will then take over coastal permit issuing authority for Coastal Zone Area One.

This site is located in "Area One" and subject to the certified LCP. It is designated "Open Space, Public Park", which is consistent with the use proposed in this project. The project site is owned by the Los Angeles County Department of Beaches and Harbors. The proposed project, as conditioned, is consistent with the public access, recreation, marine resource and visual resource policies of the current certified LUP and conditionally certified IP. Therefore, approval of this project as conditioned would not prejudice the City's ability to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

**G. California Environmental Quality Act**

Section 13096 of the Commission's regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect, which the activity may have on the environment.

The Commission finds that the proposed project, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized and there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.